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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION REGARDING
PRODUCTION OF HYPERLINKED
MATERIAL**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

JOINT STATUS REPORT

Pursuant to Dkt. No. 2432, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”) (jointly, “the parties”), respectfully submit this Joint Stipulation.

I. Production of Requested Hyperlinked Material

With respect to the following categories of material i) hyperlinks to non-Google Drive documents,¹ ii) hyperlinked documents contained within non-Gmail documents, and iii) hyperlinked documents contained within earlier-in-time emails within an email thread, the Parties hereby stipulate as follows:

1. Plaintiffs will be permitted to make one request per week, by Wednesday of each week, until the deadline for substantial completion of fact discovery, for no more than ten (10) hyperlinked documents that have otherwise not been produced, by providing Defendants a list of the specific hyperlinks along with the document Bates number in which each hyperlink appears.
2. In response to these once-weekly requests, Defendants will have five (5) business days to provide the requested hyperlinked documents to Plaintiffs to the extent the requested hyperlinked document is an internal Uber document that “is not privileged or otherwise protected from disclosure,” *see* ECF No. 2432 at 2, 6, and available to be collected.
3. If Defendants are unable to satisfy or fulfill Plaintiffs’ request(s), the Parties are required to meet-and-confer upon request within 3 business days of Defendants’ deadline to provide the requested hyperlinked documents, and Defendants will provide a written response indicating why they are unable to satisfy or fulfill Plaintiffs’ request(s). If Plaintiffs are unsatisfied by the Defendants’ explanation for why such additional documents cannot be produced, the meet-and-confer will qualify as the Parties’ final meet-and-confer for the purposes of PTO 8.
4. The limit of ten (10) hyperlinked documents per week set forth in Paragraph 1 is the compromise to which the parties have agreed for the purpose of completing depositions of Uber’s custodians. Before the deadline for substantial completion of fact discovery, the parties

¹ This stipulation does not pertain to the hyperlinked Knowledge-Base document issue or Defense Fact Sheet productions that are being handled separately.

will participate in a meet-and-confer to address any additional reasonable requests for hyperlinked documents in any of the enumerated categories, above the weekly production provided in Paragraph 1 (to the extent Plaintiffs have such requests). To the extent the parties are unable to come to an agreement, any party may address the dispute via PTO 8.

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1 **ATTESTATION**

2 Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on
3 whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

4 Dated: March 10, 2025

5 By: /s/ Michael B. Shortnacy
6 Michael B. Shortnacy

7 **CERTIFICATE OF SERVICE**

8 I hereby certify that on March 10, 2025, I electronically filed the foregoing document with
9 the Clerk of the Court using the CM/ECF system, which will automatically send notification of the
10 filing to all counsel of record.

11 By: /s/ Michael B. Shortnacy
12 Michael B. Shortnacy